



BOULT • CUMMINGS  
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OCT 4 PM 2 11

October 4, 2001  
EXECUTIVE SECRETARY

David Waddell, Esq.  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

Re: Petition of MCI WorldCom to Enforce Interconnection Agreement with  
BellSouth Telecommunications, Inc.  
Docket No. 01-00513

Dear David:

Enclosed for filing is the Direct Testimony of Dan Aronson filed on behalf of  
MCI WorldCom, Inc. and Brooks Fiber Communications of Tennessee, Inc. in the above-  
captioned proceeding.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:

*Henry Walker*  
Henry Walker *HW*

HW/nl  
Attachment  
cc: Parties

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**

**Nashville, Tennessee**

IN RE:	PETITION OF MCI	)	
	WORLDCOM TO ENFORCE	)	DOCKET NO. 01-00513
	INTERCONNECTION	)	
	AGREEMENT	)	

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**DIRECT TESTIMONY OF DAN ARONSON**

**ON BEHALF OF**

**MCI WORLDCOM, INC.**

**AND**

**BROOKS FIBER COMMUNICATIONS OF TENNESSEE, INC.**

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**October 4, 2001**

**Q. What is your name, position of employment and business address?**

A. My name is Dan Aronson. I am the Director of Carrier Billing Services for MCI WorldCom. My business address is 500 Clinton Center Drive, Clinton, Mississippi, 39056.

**Q. Please provide a summary of your background and experience.**

A. I received a BA in Psychology from the University of Kansas in 1973. From 1974 through 1983 I was employed as a research assistant in the Department of Biochemistry at the University of Kansas School of Medicine and the Departments of Nephrology and Internal Medicine at the Veterans Administration Research Center in Kansas City Missouri. I was awarded a Masters Degree in Business Administration by the Henry W. Block School of Management and Administration at the University of Missouri at Kansas City. I became a licensed CPA in 1985. I served in a series of Public Accounting firms from 1984 through 1997. The range of activities in which I was involved included individual and corporate income tax analysis, financial statement auditing, EDP auditing, contract attestation services and design and implementation of automated auditing processes. I was employed by Frederick and Warinner, CPAs, from 1990 to 1997. The services of this firm were specifically focused on firms involved in the telecommunications industry. I joined the Corporate Financial Operations Group at WorldCom in 1997 as Director of Carrier Access Billing Services.

**Q. Do your duties as Director of Carrier Billing Services for MCI WorldCom include responsibilities for billing and collection of reciprocal compensation and access charges for Brooks Fiber Communications of Tennessee?**

A. Yes. My duties include responsibility for rendering invoices to BellSouth ("BST") for reciprocal compensation and terminating switched access charges for the termination of local and toll calls from BST customers to customers of Brooks Fiber of Tennessee ("Brooks") pursuant to the interconnection agreement between Brooks Fiber and BST.

**Q. What is the purpose of your testimony?**

A. The purpose of my testimony is to identify the amount of compensation that is currently due and owing from BST to Brooks in Tennessee for the time period that the parties have been operating under the MCImetro-BST interconnection agreement.

**Q. What is the time period that the Brooks and BST have been operating under the MCImetro-BST interconnection agreement?**

A. Brooks exercised its rights under Section 252(i) of the federal Telecommunications Act of 1996 to adopt the terms of the MCImetro-BST interconnection agreement on June 16, 1999. The agreement between the parties became effective as of July 1, 1998.

**Q. What is the outstanding balance that is due and owing from BST to Brooks in Tennessee?**

A. As of the last invoice of September 10, 2001, the total amount that is due and owing from BST to Brooks in Tennessee is \$15,198,071.26. I have attached as Exhibit 1 to my testimony a summary of the transaction history between Brooks and BST under the MCImetro-BST interconnection agreement from the first invoice date of August 10, 1998 to the September 10, 2001 invoice. This transaction history shows, among other things, the (1) billed toll usage (listed as "intrastate usage") and revenues; (2) the billed local

1 usage and revenues; (3) the invoiced usage charges and the BST payments on those  
2 invoices.

3 I have made two adjustments on the schedule to reflect a lower reciprocal compensation  
4 rate of \$.004 per minute of use and to recomputed interest at 1% per month simple  
5 interest rather than compound interest.

6 **Q. Why did you make these two adjustments?**

7 A. Brooks has billed BST a reciprocal compensation rate of \$.005, the tandem  
8 interconnection rate, throughout the period from July 1998 (August 10, 1998 invoice)  
9 through July 2001 (August 10, 2001 invoice) based on our reading that the MCImetro-  
10 BST interconnection agreement provided for reciprocal compensation rates to be  
11 symmetrical. In Docket No. 99-00662, which was the Petition of MCImetro to enforce  
12 the MCImetro-BST interconnection agreement, the Hearing Officer found that the  
13 appropriate reciprocal compensation rate to be billed by MCImetro was the Direct End  
14 office interconnection rate of \$.004. While MCI WorldCom initially disagreed with that  
15 interpretation of the contract and filed exceptions to that decision, we later dismissed that  
16 appeal and accepted the TRA's decision on this point. Therefore, I have adjusted the  
17 schedule showing the amounts due and owing to reflect this lower rate throughout the  
18 period at issue.

19 I also made an adjustment to reflect a finance or late payment charge applied to  
20 outstanding amounts due based on 1% per month simple interest, rather than compound  
21 interest. The application of simple rather than compound interest was the agreement that  
22 was reached with BellSouth in April of this year after BellSouth was directed by the

1 federal District Court to pay Brooks pending the BellSouth appeal of the TRA's original  
2 decision in the Brooks Fiber case in April 1998.

3 **Q. Was Exhibit 1 prepared under your direct supervision?**

4 A. Yes.

5 **Q. Is the information in Exhibit 1 accurate?**

6 A. Yes.

7 **Q. Does this conclude your direct testimony?**

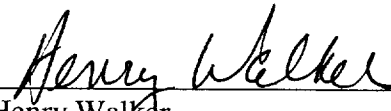
8 A. Yes

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## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via fax or hand delivery and U.S. mail to the following on this the 4<sup>th</sup> day of October, 2001.

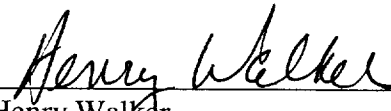
Guy Hicks, Esq.  
BellSouth Telecommunications, Inc.  
333 Commerce St., Suite 2101  
Nashville, TN 37201-3300

  
Henry Walker nz

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